

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**STEPHEN MELISE,**  
**Plaintiff**

**v.**

**COYNE-FAGUE, et al.**  
**Defendants**

:  
:  
:  
:  
:  
:  
:

**C.A. No.: 1:17-cv-00490-MSM-PAS**

**PLAINTIFF'S MOTION FOR SANCTIONS**

Plaintiff hereby moves this Court to issue sanctions against Defendants in the form of an order requiring Defendants to pay the counsel fees and costs of responding to their Motion for a Stay due to their willful and intentional refusal to comply with discovery requests and continuous pressing of frivolous arguments. As grounds therefore, and in support thereof, Plaintiff refers this Court to further argument provided in Plaintiff's memorandum in support of his objection to State Defendants' motion for a stay and in support of his motion for sanctions, filed simultaneously herewith.

WHEREFORE, Plaintiff respectfully prays that this Court grant Plaintiff's motion and order State Defendants to pay the counsel fees and costs of responding to their Motion for a Stay as a sanction for Defendants' willful and intentional refusal to comply with discovery requests and requiring Plaintiff to respond to numerous frivolous arguments.

Plaintiff,  
By his attorney,

**Dated: July 28, 2020**

/s/ Chloe A. Davis  
**Chloe A. Davis, Esq.** Bar No. 9334  
Sinapi Law Associates, Ltd.  
2374 Post Road, Suite 201  
Warwick, RI 02886  
Phone: (401) 739-9690  
Email [cad@sinapilaw.com](mailto:cad@sinapilaw.com)

**CERTIFICATION**

Jeffrey G. Latham, Esquire  
Christine A. Stowell, Esquire  
Tate & Latham  
40 Westminster Street, Suite 350  
Providence, RI 02903  
(401) 421-7400  
[jlatham@tatelawri.com](mailto:jlatham@tatelawri.com)  
[cstowell@tatelawri.com](mailto:cstowell@tatelawri.com)

Justin J. Sullivan, Esquire  
Lauren E. Hill, Esquire  
Department of the Attorney General  
150 South Main Street  
Providence, RI 02903  
401-274-4400  
[jsullivan@riag.ri.gov](mailto:jsullivan@riag.ri.gov)  
[lhill@riag.gov](mailto:lhill@riag.gov)

I hereby certify that on **July 28, 2020**, a true copy of the within was filed electronically via the Court's CM/ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and the filing is available for viewing and downloading from the Court's CM/ECF System. Service on the counsel of record listed above has been effectuated by electronic means.

/s/ **Chloe A. Davis**